

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)
(Jointly Administered)

RE: D.I. D.I. 11316

**CERTIFICATION OF COUNSEL REGARDING MOTION TO FILE EXHIBIT A TO
MOTION TO VACATE THE ORDER GRANTING FTX DEBTORS' MOTION TO
ESTIMATE CLAIMS BASED ON DIGITAL ASSETS
WITH RESPECT TO NUGENESIS OU AND NUGENESIS PTY LTD UNDER SEAL**

I, Michael Busenkell, of Gellert Seitz Busenkell & Brown, LLC, counsel for NuGenesis Ou and NuGenesis PTY Ltd. (collectively, "NuGen") hereby certify as follows:

1. On April 5, 2024, NuGen, by and through its undersigned counsel, filed the *Motion to File Exhibit A to Motion to Vacate The Order Granting FTX Debtors' Motion to Estimate Claims Based on Digital Assets With Respect to Nugenesis Ou and Nugenesis PTY Ltd Under Seal* (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court") [D.I. 11316].

2. On April 5, 2024, NuGen filed a proposed redacted version of Exhibit A (the "Proposed Redacted Document") [D.I. 11321].

3. Pursuant to the Notice filed with the Motion the deadline to object or otherwise respond to entry of an order approving the Motion was set for April 19, 2024, at 4:00 pm (ET) (the "Objection Deadline").

4. Prior to the Objection Deadline, counsel for NuGen received informal comments from the Office of the United States Trustee (the "UST") regarding the Proposed Redacted Document.

5. Thereafter, counsel for NuGen and the UST engaged in good faith communications and agreed upon revised redactions, attached hereto as Exhibit A (the “Revised Proposed Redacted Document”). The UST had no comments on the proposed form of order granting the Motion, which is reattached here as Exhibit B.

6. The undersigned certifies that he has reviewed the docket in this case and no other answer, objection or other responsive pleading to the Motion appears thereon.

WHEREFORE NuGen requests that the Court enter the Proposed Order filed with the Motion at its earliest convenience.

Dated: May 2, 2024
Wilmington, Delaware

**GELLERT SEITZ BUSENKELL &
BROWN LLC**

/s/ Michael Busenkell
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